

**EXHIBIT**  
**6**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARCANA DIVISION  
CASE NO. 5:21-CV-00077-RWS

CATHX RESEARCH LTD.,

Plaintiff(s),

vs.

2G ROBOTICS INC., a/k/a  
VOYIS IMAGING INC.,

Defendant(s).

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REMOTE 30(b)(6) VIDEOTAPED DEPOSITION UNDER ORAL

EXAMINATION OF

ADRIAN BOYLE

DATE: January 4, 2023

REPORTED BY: MICHAEL FRIEDMAN, CCR

\*\*\*\*\*  
\* CONFIDENTIAL \*  
\* ATTORNEYS EYES ONLY \*  
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\*\*\* ROUGH DRAFT \*\*\*

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JOB # 010423-MFH

1           A     I don't believe so not particularly  
2     no, not that I can recall.

3           Q     Did you review the patents that are  
4     asserted in this case?

5           A     I probably -- probably not  
6     specifically no.

7           Q     When was the last time you reviewed  
8     the patents asserted in this case?

9           A     I suspect about a month ago.

10          Q     Did you speak with anybody other  
11     than counsel in preparation for your  
12     deposition today?

13          A     I didn't.

14          Q     Okay. A few more documents I will  
15     add to the chat. Well let's start with this  
16     one I've added to the chat the 841 patent  
17     could you please let me know when you have  
18     that open?

19          A     Okay.

20          Q     Can we please mark for the record  
21     as Exhibit 4 U.S. patent number 10116841.

22                     (Whereupon the above mentioned was  
23     marked for Identification.)

24          A     I have that open.

25          Q     Do you recognize this document

1 Mr. Boyle?

2 A I do.

3 Q What is this document?

4 A It's the 841 patent.

5 Q Are you an inventor on this patent?

6 A I am.

7 Q Okay. I'm going to add the patent  
8 to the chat please let me know when you have  
9 the next document opened for the record can  
10 we please mark as Exhibit 5 U.S. patent  
11 number 10116842.

12 (Whereupon the above mentioned was  
13 marked for Identification.)

14 A I have that open.

15 Q Do you recognize this document?

16 A I do.

17 Q What is this document?

18 A It's the 842 patent.

19 Q Are you an inventor on this patent?

20 A I am.

21 Q Looking at the 842 patent, can you  
22 scroll down to page 28 of the PDF if you look  
23 at column 1 on the top left side?

24 A Sorry what page.

25 Q PDF page 28 column 1?

1           A     Yeah, I got it.

2           Q     Do you see in the top left side  
3     there's a section called related patents  
4     under column --

5           A     Related applications.

6           Q     Yes, he I'm sorry related  
7     applications?

8           A     Yeah, I do.

9           Q     The -- I will represent to you that  
10    the related applications section of patent  
11    discusses the priority chain of the patent do  
12    you understand what is your understanding of  
13    the priority or the chain of applications of  
14    the 842 patent?

15                   MR. BISHOP:  Objection, form.

16           A     My understanding of the chain of  
17    applications I don't understand that at all.

18           Q     Sorry I will rephrase do you  
19    understand the 842 patent was filed based on  
20    a series of applications in the P.C. T patent  
21    cooperation trade treaty and based on United  
22    Kingdom Dom applications?

23                   MR. BISHOP:  Objection, form.

24           A     Sorry give me that once more.

25           Q     Yeah do you understand that the 842

1 patent claims priority which means it claims  
2 the filing date of patent applications that  
3 were filed internationally including in the  
4 United Kingdom?

5 MR. BISHOP: Objection to form.

6 A Yeah.

7 Q What is your understanding of the  
8 priority claim of the 842 patent?

9 A Of the priority claim I don't  
10 understand what is meant by the priority  
11 claim do you mean the date of that claim?

12 Q Yeah let me be a little bit more  
13 specific do you understand that the 842  
14 patent claims priority to a United Kingdom  
15 patent application that was filed on  
16 October 17, 2012?

17 MR. BISHOP: Objection to form.

18 A I do.

19 Q Now can you please look at -- on  
20 Exhibit 4 the 841 patent can we please look  
21 at that exact same paragraph which would be  
22 page 28 of the Exhibit 4, the 841 patent?

23 A Yeah.

24 Q Okay.

25 A Got it.

1           Q     Do you see that same related  
2     application section?

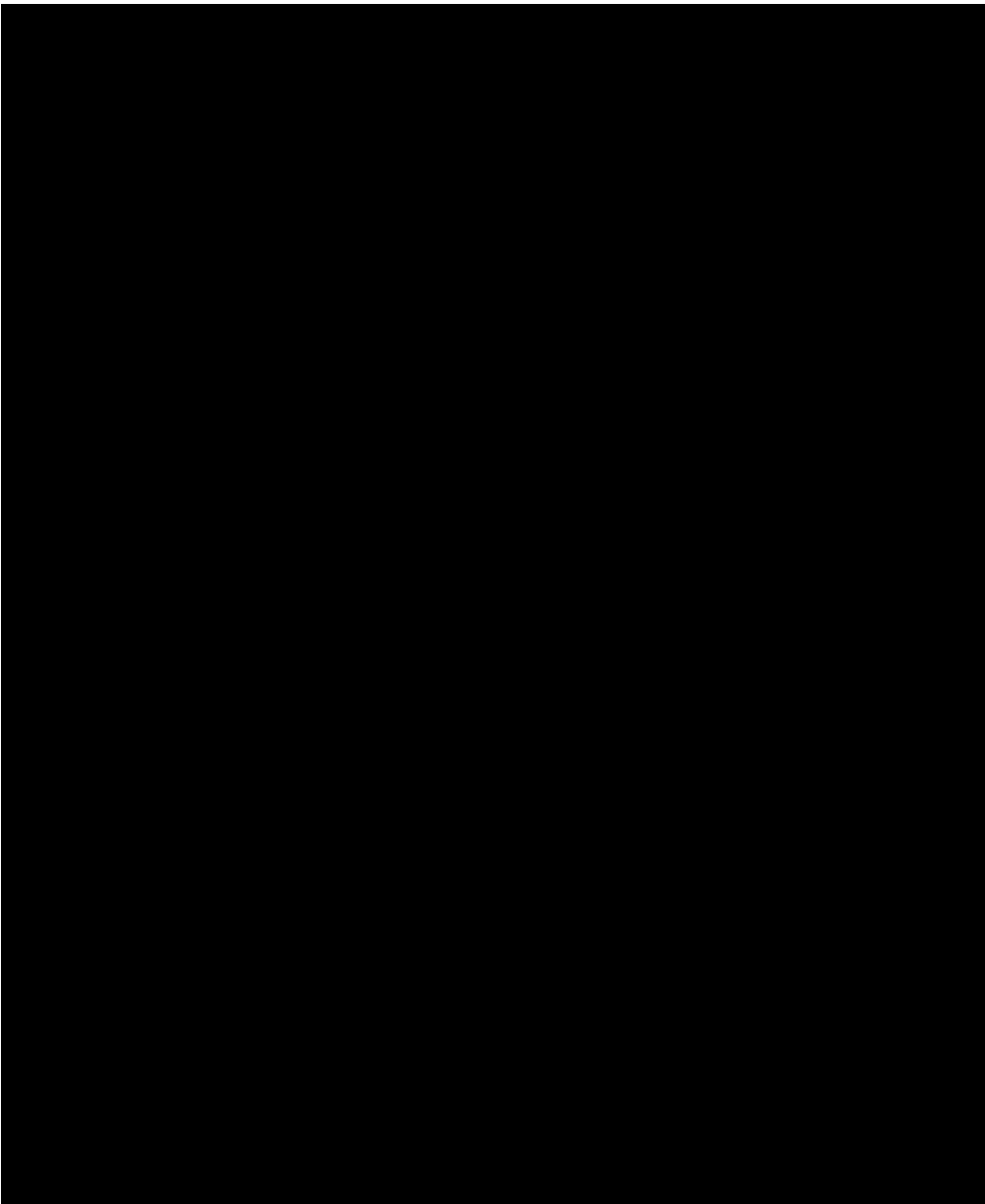
3           A     I do.

4           Q     Do you see at the bottom of the  
5     first paragraph you can see that application  
6     GB 1218648 dot 2 was filed October 17, 2012?

7           A     I do yeah.

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18 Q And did CathX file a patent on that  
19 concept or that invention?

20 A I believe --

21 MR. BISHOP: Objection to form.

22 Q Sorry what was your answer?

23 A I believe we did.

24 Q Can we look at the exhibit number 5  
25 marked as the 842 patent?



1           A     Sure.

2           Q     Are you familiar with the with the  
3     technology of the 842 patent?

4           A     I am.

5           Q     What invention was what technology  
6     were you filing an invention a patent on in  
7     this patent?

8                     MR. BISHOP:  Objection, form.

9           Q     Let me rephrase that into a better  
10    question.  What technology were you seek to  
11    go protect when you filed the 842 patent?

12                    MR. BISHOP:  Objection, form.

13          A     The laser I think if the title of  
14    this one let me just picture if I have this  
15    right.  Yeah so this is specifically around  
16    range and dimensional information methods to  
17    acquire that information from surveys.

18          Q     Let's look at the claims of the 842  
19    patent if you can scroll down to claim 1  
20    which is on PDF page 45 of Exhibit 5.

21          A     Yeah.

22          Q     Do you see under claim 1 there's a  
23    limitation that begins with the camera  
24    configured?

25          A     The camera configured you mean the

1 so let's look at claim 1 of the '842 patent  
2 it's on PDF page 45?

3 A Okay.

4 Q So there's do you see that the  
5 first the preamble on the claim or the first  
6 part of the sentence of the claim says an  
7 underwater survey system for gathering range  
8 in three dimensional information of subsea  
9 objects the system?

10 A Yes.

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17 Q Then the system comprising so the  
18 system comprises a camera configured to  
19 capture images ever a subsea scene do you see  
20 that?

21 A I do.

22 Q Did CathX invent using a camera  
23 configured to capture images of a subsea sea?

24 MR. BISHOP: Objection, form.

25 A Did we invent a capture a camera

1 captures images of a subsea scene no.

2 Q The next one reads -- the next part  
3 of the sentence reads one or more reference  
4 projection light sources configured to  
5 project one or more structured light beams.

6 Do you see that Mr. Boyle?

7 A I do.

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